

**FILED**

July 22, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

BY: Julie Golden  
DEPUTY

TEXAS CIVIL RIGHTS PROJECT,  
*Plaintiff,*

v.

U.S. CUSTOMS AND BORDER  
PROTECTION,  
*Defendant.*

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Civil Action No. 1:24-cv-00535-DII

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**AGREED SCHEDULE**

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Pursuant to Federal Rule of Civil Procedure 16, the following Agreed Scheduling Order is issued by the Court:

1. By **August 16, 2024**, Defendant will provide Plaintiff with a Vaughn Index.
2. By no later than **September 27, 2024**, Plaintiff will provide counsel for Defendants a list of alleged deficiencies (including challenges to any asserted FOIA exemptions for withheld or redacted documents), if any, in the production.
3. By **October 25, 2024**, Defendants will respond to the list of alleged deficiencies with additional materials or written explanations as to any remaining alleged deficiencies. Counsel for the parties have agreed to confer as needed on the alleged deficiencies.
4. By **November 22, 2024**:
  - a. If all FOIA searches and productions are sufficient, and alleged deficiencies have been addressed to Plaintiff's satisfaction, Plaintiff will execute a joint stipulation of dismissal; or

b. If any alleged deficiencies remain, the parties will file any motions they deem necessary to resolve any remaining issues.

5. In light of the foregoing, the parties propose filing another Joint Status Report with the Court on or before **November 15, 2024**, to apprise the Court of the progress of the parties' negotiations and Defendant's productions.

By filing an agreed motion, the parties may request that this Court extend any deadline set in this Order. The Court may impose sanctions under Federal Rule of Civil Procedure 16(f) if the parties do not make timely submissions under this Order.

SIGNED on 07/22/2024.

A handwritten signature in blue ink, appearing to read 'R. Pitman', is written over a horizontal line.

ROBERT PITMAN  
UNITED STATES DISTRICT JUDGE